CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:	Turner FTTP Upgrade
Proposed Implementation Date:	2019
Proponent:	Triangle Communications
Location:	Turner, Montana
County:	Blaine

I. TYPE AND PURPOSE OF ACTION

Triangle Telephone Cooperative Assn., Inc. (TTCA, Inc.) is proposing to install new underground telecommunications facilities to upgrade their current facilities and services to the Turner Exchange serving area in and around Turner, Montana. These improvements will offer state-of-the-art telecommunications toll and distribution facilities, as well as future growth capabilities.

Multiple Application have been submitted, since all submitted application are close in proximity and for ease of processing we will include all submitted areas in one Environmental Assessment.

Locations:

(1) E1/2 SW1/4 **S16 T35N R24E** Blaine County, 1.127 acres

(2) NW1/4 NE1/4 **S12 T34N R24E** Blain County, .281 acres
N1/2 SE1/4 SW1/4 and the SE1/4 SW1/4 **S36 T34N R23E** Blaine County, 1.842 acres

(3) W1/2 W1/2 and the S1/2 S1/2 **S36 T37N R25E** Blaine County, 3.667 acres

(4) E1/2 SE1/4 **S34 T35N R25E** Blaine County, 1.213 acres
N1/2 N1/2 **S33 T35N R25E** Blaine County, 2.501 acres
N1/4 NE1/4 **S32 T35N R25E** Blaine County, .706 acres
Se1/4 Se1/4 **S31 T35N R25E** Blaine County, .693 acres

Total approx. 12 acres

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED:

Provide a brief chronology of the scoping and ongoing involvement for this project.

Montana DNRC, Havre Field Office, Ryan Call - Land Use specialist
Montana DNRC, Glasgow Unit, Jack Medlicott - Land Use specialist
Triangle Communications, Brian Lockner, Right-of-way Specialist
All lessees on state land have been contacted and signed a notice of settlement of damage

2. OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:

3. ALTERNATIVES CONSIDERED:

Alternative A: The alternative to allow for the use of the state land located in the described section for installing a new upgraded telecommunications cable

Alternative B: The “No Action” alternative

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:
Consider the presence of fragile, compactable or unstable soils. Identify unusual geologic features. Specify any special reclamation considerations. Identify any cumulative impacts to soils.

Alternative A – The breakdown of each of the soil types is listed in subsequent pages (Exhibit A). The overall general soil characteristic is that the soils are only moderately fragile with low slopes, high vegetation, low organic matter, and very dry. The erosion risk is at a minimal and the soils are not of high importance to farming practices

Alternative B- The "No Action" alternative

5. WATER QUALITY, QUANTITY AND DISTRIBUTION:
Identify important surface or groundwater resources. Consider the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality. Identify cumulative effects to water resources.

Alternative A. Due to the short duration in which soil piles will exist and the proposed, there would be little risk of soils running off into the nearby waterways and causing an exceedance of water quality standards.

Alternative B- The "No Action" alternative

6. AIR QUALITY:
What pollutants or particulate would be produced? Identify air quality regulations or zones (e.g. Class I air shed) the project would influence. Identify cumulative effects to air quality.

Alternative A- No significant impact expected.

Alternative B- The "No Action" alternative

7. VEGETATION COVER, QUANTITY AND QUALITY:
What changes would the action cause to vegetative communities? Consider rare plants or cover types that would be affected. Identify cumulative effects to vegetation.

Alternative A- There is no evidence of rare plants or cover types in the scope of the project. The majority of the project is clear of invasive grasses such as Crested Wheatgrass (*Agropyrum cristatum*). The disturbance to the ground could potentially cause an influx of invasive grasses and pre-cautions should be taken to avoid an influx of such grasses.

Alternative B- The "No Action" alternative

8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:
Consider substantial habitat values and use of the area by wildlife, birds or fish. Identify cumulative effects to fish and wildlife.

Alternative A- There are several species of concern in this area (Section 9). Under the Migratory Bird Treaty Act of 1918 it is unlawful to remove or disturb an active nest even if it is in an inconvenient location. If the timeframe of this project falls within April to July there is the potential for the projected to be stopped due to ground nesting birds.
There are no other impacts to other wildlife species anticipated

Alternative B- The "No Action" alternative

9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:

Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify cumulative effects to these species and their habitat.

There are three species of concern in this area. The Hoary bat (*Lasiurus cinereus*), Ferruginous Hawk (*Buteo regalis*) and Greater Sage-Grouse (*Centrocercus urophasianus*). No perceived issues will occur with habitat destruction on the Hoary bat or Ferruginous hawk.

Slight disturbance could occur to sage-grouse habitat although unlikely as the work is being conducted next to existing roads and there are no Leks within 2 miles of the propsed area. There has been a consultation done by the Montana Sage Grouse Habitat Conservation Program and the findings are enclosed (Exhibit B)

Alternative B- The "No Action" alternative

10. HISTORICAL AND ARCHAEOLOGICAL SITES:

Identify and determine effects to historical, archaeological or paleontological resources.

Alternative A- This area has a significant amount of documented Stone Circles and Teepee rings associated with Native Americans. Since this project is located next to existing roadways there should be minimal contact and or disturbance to any area of historical importance.

Alternative B- The "No Action" alternative

11. AESTHETICS:

Determine if the project is located on a prominent topographic feature or may be visible from populated or scenic areas. What level of noise, light or visual change would be produced? Identify cumulative effects to aesthetics.

Alternative A- Very little impact should be felt aesthetically in the scope of this project. There should be minimal lasting affects on the landscape from this project.

Alternative B- The "No Action" alternative

12. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY:

Determine the amount of limited resources the project would require. Identify other activities nearby that the project would affect. Identify cumulative effects to environmental resources.

Alternative A- As stated in the proposed plan "These improvements will offer state-of-the-art telecommunications toll and distribution facilities, as well as future growth capabilities" There are no adverse impacts anticipated at this time.

Alternative B- The "No Action" alternative

13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:

List other studies, plans or projects on this tract. Determine cumulative impacts likely to occur because of current private, state or federal actions in the analysis area, and from future proposed state actions in the analysis area that are under MEPA review (scoped) or permitting review by any state agency.

Alternative A- No significant impact expected.

Alternative B- The "No Action" alternative

IV. IMPACTS ON THE HUMAN POPULATION

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

14. HUMAN HEALTH AND SAFETY:
Identify any health and safety risks posed by the project.

Alternative A- Typical safety risks for laborers working with mechanized equipment would be present, but the potential risk should be minimal with proper safety efforts.

Alternative B- The "No Action" alternative

15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:
Identify how the project would add to or alter these activities.

Alternative A- No Impacts Expected

Alternative B- The "No Action" alternative

16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:
Estimate the number of jobs the project would create, move or eliminate. Identify cumulative effects to the employment market.

Alternative A- Potentially creating increased jobs and availability of communications to the Turner area

Alternative B- The "No Action" alternative

17. LOCAL AND STATE TAX BASE AND TAX REVENUES:
Estimate tax revenue the project would create or eliminate. Identify cumulative effects to taxes and revenue.

Alternative A- No Impacts Expected

Alternative B- The "No Action" alternative

18. DEMAND FOR GOVERNMENT SERVICES:
Estimate increases in traffic and changes to traffic patterns. What changes would be needed to fire protection, police, schools, etc.? Identify cumulative effects of this and other projects on government services

Alternative A- No Impacts Expected

Alternative B- The "No Action" alternative

19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:
List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.

Alternative A- No Impacts Expected

Alternative B- The "No Action" alternative

20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:
Identify any wilderness or recreational areas nearby or access routes through this tract. Determine the effects of the project on recreational potential within the tract. Identify cumulative effects to recreational and wilderness activities.

Alternative A- No Impacts Expected

Alternative B- The "No Action" alternative

21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:
Estimate population changes and additional housing the project would require. Identify cumulative effects to population and housing.

Alternative A- No Impacts Expected

Alternative B- The "No Action" alternative

22. SOCIAL STRUCTURES AND MORES:
Identify potential disruption of native or traditional lifestyles or communities.

Alternative A- No Impacts Expected

Alternative B- The "No Action" alternative

23. CULTURAL UNIQUENESS AND DIVERSITY:
How would the action affect any unique quality of the area?

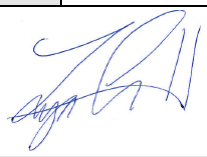
Alternative A- No Impacts Expected

Alternative B- The "No Action" alternative

24. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:
Estimate the return to the trust. Include appropriate economic analysis. Identify potential future uses for the analysis area other than existing management. Identify cumulative economic and social effects likely to occur because of the proposed action.

Alternative A- No Impacts Expected

Alternative B- The "No Action" alternative

EA Checklist Prepared By:	Name: Ryan Call Title: Havre- Land Use Specialist	
Signature 		Date May 30, 2019

V. FINDING

25. ALTERNATIVE SELECTED: Alternative A

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

The granting of these RoW on these tracts of state-owned trust lands should not result in nor cause significant negative environmental impacts. The proposed action satisfies the trusts fiduciary mandate and ensures the long-term productivity of the land. An environmental assessment checklist is the appropriate level of analysis for the proposed action

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

	EIS		More Detailed EA	X	No Further Analysis

EA Checklist Approved By:	Name: Jocee Hedrick Title: Lewistown Unit Manager	
Signature 		Date June 3, 2019

(Exhibit A)

1. **S16 T35N R24E**

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
3	Attewan loam, 0 to 4 percent slopes	Not rated	Attewan (90%) Beaverell (5%) Wabek (5%)		292.5	45.8%
90	Nishon loam	Not rated	Nishon (95%) Dimmick (5%)		3.9	0.6%
119	Telstad loam, 0 to 4 percent slopes	**Moderately fragile**	Telstad (90%)	Very low organic matter (0.84) Moderate vegetative cover (0.82) Semi-dry (0.41) Well structured (0.25) Nearly level (0.04)	342.3	53.6%
			Joplin (5%)	Very low organic matter (0.84) Moderate vegetative cover (0.82) Semi-dry (0.41) Well structured (0.25) Gently sloping (0.07)		
			Fortbenton (1%)	Very low organic matter (0.90) Moderate vegetative cover (0.82) Semi-dry (0.41) Nearly level (0.04)		
			Nishon (1%)	Extremely low organic matter (0.96) Semi-dry (0.41) Moderately-high vegetative cover (0.18)		

2. **S12 T34N R24E**

Summary by Map Unit — Blaine County and Part of Phillips County Area, Montana (MT608)

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
39	Dimmick clay	Not rated	Dimmick (95%) Nishon (5%)		6.2	1.0%
91	Nishon clay loam	Not rated	Nishon (95%) Dimmick (5%)		15.0	2.3%
109	Scobey-Kevin clay loams, 0 to 4 percent slopes	Not rated	Scobey (55%) Kevin (35%) Elloam (3%) Phillips (3%) Hillon (2%) Dimmick (1%) Nishon (1%)		45.0	7.0%
110	Scobey-Kevin clay loams, 2 to 8 percent	**Moderately fragile**	Scobey (45%)	Very low organic matter (0.84)	550.4	85.7%

Summary by Map Unit — Blaine County and Part of Phillips County Area, Montana (MT608)

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
	slopes			Moderate vegetative cover (0.82) Semi-dry (0.41) Well structured (0.25) Gently sloping (0.07) Very low organic matter (0.84)		
			Kevin (40%)	Moderate vegetative cover (0.82) Semi-dry (0.41) Well structured (0.25) Gently sloping (0.07) Extremely low organic matter (0.96)		
			Nishon (2%)	Semi-dry (0.41) Moderately-high vegetative cover (0.18)		
122	Telstad-Joplin gravelly loams, 0 to 4 percent slopes	Not rated	Telstad (45%) Joplin (40%) Assinniboine (5%) Attewan (5%) Wabek (5%)		25.9	4.0%

3. **S36 T37N R25E**

Summary by Map Unit — Blaine County and Part of Phillips County Area, Montana (MT608)

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
5	Attewan-Wabek complex, 0 to 4 percent slopes	Not rated	Attewan (55%) Wabek (30%) Beaverell (8%) Chinook (7%)		15.4	1.2%
55	Havre loam	Not rated	Havre (90%) Glendive (5%) Harlem (5%)		5.5	1.4%
68	Hillon-Kevin clay loams, 8 to 25 percent slopes	Moderately fragile	Hillon (55%)	Very low organic matter (0.90) Semi-dry (0.41) Moderately steep (0.27) Well structured (0.25) Moderately-high vegetative cover	86.8	2.3%

Map unit symbol	Map unit name	Rating	Component name	Component (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
					(0.18)		
					Very low organic matter (0.84)		
					Semi-dry (0.41)		
				Kevin (30%)	Moderately steep (0.27)		
					Well structured (0.25)		
					Moderately-high vegetative cover (0.18)		
					Very low organic matter (0.90)		
					Semi-dry (0.41)		
			Hillon, gravelly surface		Well structured (0.25)		
				(8%)	Moderately-high vegetative cover (0.18)		
					Strongly sloping (0.11)		
					Very low organic matter (0.84)		
					Moderate vegetative cover (0.82)		
			Scobey		Semi-dry (0.41)		
				(2%)	Well structured (0.25)		
					Gently sloping (0.07)		
					Very low organic matter (0.84)		
					Semi-dry (0.41)		
			Sunburst		Moderately steep (0.27)		
				(2%)	Well structured (0.25)		
					Moderately-high vegetative cover (0.18)		
					Very low organic matter (0.84)		
					Weakly structured (0.75)		
				Acel (2%)	Semi-dry (0.41)		
					Moderately-high vegetative cover		

Map unit symbol	Map unit name	Rating	Component name	Component (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
					(0.18) Gently sloping (0.07) Very low organic matter (0.84) Shallow (0.52) Semi-dry (0.41) Moderately steep (0.27) Moderately-high vegetative cover (0.18)		
76	Lardell silty clay loam	Not rated	Neldore	(1%)		0.4	1.6%
			Lardell	(90%)			
			Havre	(3%)			
			Harlem	(3%)			
			Nobe	(3%)			
			Soils with grv substratum	(1%)			
97	Phillips-Elloam complex, 0 to 4 percent slopes	Moderately fragile	Phillips	(50%)	Very low organic matter (0.84) Semi-dry (0.41) Well structured (0.25) Moderately-high vegetative cover (0.18) Nearly level (0.04) Very low organic matter (0.90) Very shallow (0.90) Semi-dry (0.41) Well structured (0.25) Moderately-high vegetative cover (0.18)	24.3	19.6%
			Elloam	(25%)			
			Kevin	(6%)	Very low organic matter (0.84) Semi-dry (0.41) Well structured (0.25) Moderately-high vegetative cover (0.18)		

Map unit symbol	Map unit name	Rating	Component name	Component (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
					Gently sloping (0.07) Very low organic matter (0.90) Very shallow (0.77) Semi-dry (0.41) Well structured (0.25) Moderately-high vegetative cover (0.18)		
			Thoeny	(6%)			
			Absher	(5%)	Very shallow (0.97) Very low organic matter (0.90) Semi-dry (0.41) Well structured (0.25) Moderately-high vegetative cover (0.18)		
			Ethridge	(3%)	Very low organic matter (0.90) Semi-dry (0.41) Well structured (0.25) Moderately-high vegetative cover (0.18) Nearly level (0.02)		
			Hillon (2%)		Very low organic matter (0.90) Semi-dry (0.41) Well structured (0.25) Moderately-high vegetative cover (0.18) Gently sloping (0.07)		
			Nishon (1%)		Extremely low organic matter (0.96) Semi-dry (0.41) Moderately-high vegetative cover		

Map unit symbol	Map unit name	Rating	Component name	Component (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
					(0.18)		
					Nearly level (0.01)		
109	Scobey-Kevin clay loams, 0 to 4 percent slopes	Not rated	Scobey	(55%)		1.7	13%	0.
			Kevin	(35%)				
			Elloam	(3%)				
			Phillips	(3%)				
			Hillon	(2%)				
			Dimmick	(1%)				
			Nishon	(1%)				
119	Telstad loam, 0 to 4 percent slopes	Moderately fragile	Telstad	(90%)	Very low organic matter (0.84)	7.3	17%	2.
					Moderate vegetative cover (0.82)			
					Semi-dry (0.41)			
					Well structured (0.25)			
					Nearly level (0.04)			
			Joplin	(5%)	Very low organic matter (0.84)			
					Moderate vegetative cover (0.82)			
					Semi-dry (0.41)			
					Well structured (0.25)			
					Gently sloping (0.07)			
			Nishon	(1%)	Extremely low organic matter (0.96)			
					Semi-dry (0.41)			
					Moderately-high vegetative cover (0.18)			
			Fortbenton	(1%)	Very low organic matter (0.90)			
					Moderate vegetative cover (0.82)			
					Semi-dry (0.41)			
					Nearly level (0.04)			
13	Ustic	Not	Ustic			6		9.

Summary by Map Unit — Blaine County and Part of Phillips County Area, Montana (MT608)

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
1	Torrifluvents, wet	rated	Torrifluvents (95%) Havre (2%) Harlem (2%) Very gravelly substratum soils (1%)		2.2	8%

4. **S31,32,33,34 T35N R25E**

Summary by Map Unit — Blaine County and Part of Phillips County Area, Montana (MT608)

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
3	Attewan loam, 0 to 4 percent slopes	Not rated	Attewan (90%) Beaverell (5%) Wabek (5%)		84.9	15%	7.
4	Attewan-Beaverell complex, 0 to 4 percent slopes	Not rated	Attewan (55%) Beaverell (30%) Chinook (8%) Wabek (7%)		43.1	5.9%	21
34	Cozberg fine sandy loam, 0 to 4 percent slopes	Not rated	Cozberg (85%) Assinniboine (5%) Chinook (5%) Wabek (5%)		60.5	2.5%	10
109	Scobey-Kevin clay loams, 0 to 4 percent slopes	Not rated	Scobey (55%) Kevin (35%) Elloam (3%) Phillips (3%) Hillon (2%) Dimmick (1%) Nishon (1%)		6.1	6.7%	2.
110	Scobey-Kevin clay loams, 2 to 8 percent slopes	Moderately fragile	Scobey (45%)	Very low organic matter (0.84) Moderate vegetative cover	26.1	4.2%	17

Map unit symbol	Map unit name	Rating	Component name (percent)		Rating reasons (numeric values)	Acres in AOI	Percent of AOI
					(0.82) Semi-dry (0.41) Well structured (0.25) Gently sloping (0.07) Very low organic matter (0.84) Moderate vegetative cover (0.82)		
			(40%)	Kevin	Semi-dry (0.41) Well structured (0.25) Gently sloping (0.07) Extremely low organic matter (0.96)		
			(2%)	Nishon	Semi-dry (0.41) Moderately-high vegetative cover (0.18) Very low organic matter (0.84) Moderate vegetative cover (0.82)		
			(90%)	Telstad	Semi-dry (0.41) Well structured (0.25) Nearly level (0.04) Very low organic matter (0.84)		
9	11 Telstad loam, 0 to 4 percent slopes	Moderately fragile			Moderate vegetative cover (0.82)	02.8	2 2% 8.
			(5%)	Joplin	Semi-dry (0.41) Well structured (0.25) Gently sloping (0.07) Extremely low organic matter (0.96)		
			(1%)	Nishon	Semi-dry (0.41) Moderately-high vegetative cover		

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI	
				(0.18) Very low organic matter (0.90) Moderate vegetative cover (0.82) Semi-dry (0.41) Nearly level (0.04)			
			Fortbenton (1%)	Very low organic matter (0.84) Moderate vegetative cover (0.82) Semi-dry (0.41) Well structured (0.25) Nearly level (0.04)			
			Telstad (50%)	Very low organic matter (0.84) Moderate vegetative cover (0.82) Semi-dry (0.41) Well structured (0.25) Nearly level (0.04)			
10	12 Telstad-Joplin loams, 0 to 4 percent slopes	Moderately fragile	Joplin (35%)	Very low organic matter (0.90) Moderate vegetative cover (0.82) Semi-dry (0.41) Well structured (0.25) Nearly level (0.04)	65.0	5.8%	22
			Fortbenton (5%)	Very low organic matter (0.84) Moderate vegetative cover (0.82) Semi-dry (0.41) Nearly level (0.04)			
11	12 Telstad-Joplin loams, 2 to 8 percent slopes	Moderately fragile	Telstad (45%)	Very low organic matter (0.84) Moderate vegetative cover (0.82) Semi-dry (0.41) Well structured (0.25) Gently sloping (0.07)	27.8	2.2%	9.
			Joplin	Very low			

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres in AOI	Percent of AOI
			(40%)	organic matter (0.84) Moderate vegetative cover (0.82) Semi-dry (0.41) Well structured (0.25) Gently sloping (0.07) Very low organic matter (0.90) Moderate vegetative cover (0.82) Semi-dry (0.41) Gently sloping (0.07)		
			Fortbenton (3%)	Very low organic matter (0.84) Moderate vegetative cover (0.82) Semi-dry (0.41) Moderately deep (0.25) Gently sloping (0.07)		
			Marmarth (1%)			

(Exhibit B)

MONTANA SAGE GROUSE HABITAT CONSERVATION PROGRAM

STEVE BULLOCK, GOVERNOR
1539 ELEVENTH AVENUE
STATE OF MONTANA
PHONE: (406) 444-0554
FAX: (406) 444-6721
PO BOX 201601
HELENA, MONTANA 59620-1601

Project No. 3445
Governor's Executive Orders 12-2015 and 21-2015
Turner FTTH

Corey Baker
Westech Environmental
3005 Airport Road
Helena, MT 59601

April 18, 2019

Dear Mr. Baker,

The Montana Sage Grouse Habitat Conservation Program received a request for consultation and review of the Triangle Telephone Cooperative Inc. project or proposed activity on February 22, 2019, with additional information necessary for Program review received on March 22, 2019. Based on the information provided, all or a portion of this project is located within General Habitat for sage grouse.

Executive Orders 12-2015 and 21-2015 set forth Montana's Sage Grouse Conservation Strategy. Montana's goal is to maintain viable sage grouse populations and conserve habitat so that Montana maintains flexibility to manage our own lands, our wildlife, and our economy and a listing under the federal Endangered Species Act is not warranted in the future.

The Program has completed its review, including:

Project Description:

Project Type: Infrastructure - Communication
Project Disturbance: 87.93 Miles of Buried Fiber Cable in General Habitat
Construction Dates: April, 2019 to November, 2019, Temporary (< 1 Year)
Disturbance Duration: April, 2019 to November, 2019, Temporary (< 1 Year)

Project Location:

Entire Project Legal:

Township 33 North, Range 23 East, Sections 1, 2, 5, 6, 7,10,15,16,18,19, 20, 21, 29, 30
Township 34 North, Range 23 East, Sections 31, 36

Township 34 North, Range 24 East, Sections 1, 11, 12,13, 14, 21, 22, 24, 25, 28, 29, 30, 31
Township 34 North, Range 25 East, Sections 6, 10, 11, 2, 3, 30, 31
Township 35 North, Range 25 East, Sections 22, 25, 26, 27, 28, 29, 31, 32, 33, 34
Township 35 North, Range 28 East, Sections 3, 4, 10
Township 36 North, Range 24 East, Sections 1
Township 36 North, Range 25 East, Sections 1, 4, 9, 10, 12, 13, 15, 22, 24
Township 36 North, Range 26 East, Sections 6, 14, 17, 18, 23, 24
Township 36 North, Range 27 East, Sections 7, 13, 18, 19, 23, 24, 26, 27, 28
Township 36 North, Range 28 East, Sections 4, 5, 6, 7, 18, 19, 27, 28, 29, 30, 32, 33
Township 37 North, Range 23 East, Sections 21, 26, 27, 28
Township 37 North, Range 24 East, Sections 35
Township 37 North, Range 25 East, Sections 1, 12, 13, 2, 21, 24, 25, 26, 27, 28, 35, 36
Township 37 North, Range 26 East, Sections 6, 7, 8, 9, 10, 11, 12, 31, 32, 33, 34, 35
Township 37 North, Range 27 East, Sections 9, 10, 7, 8

County: Blaine and Phillips
Ownership: State Trust Lands, Private, Bureau of Land Management, US Dept of Defense

Project Description and Executive Orders 12-2015 and 21-2015 Consistency:

The project proposes to install buried fiber cable in designated General Habitat for sage grouse.

Triangle Telephone Cooperative Association Inc. proposes the Turner Fiber-To-The-Home (FTTP) Project. Triangle will install 211.3 miles of buried fiber optic cable to residents of Blaine and Phillips Counties. The project includes 107.27 miles of cable installation where 87.93 miles of cable fall within EO General Habitat and 19.34 miles of contiguous cable lines fall outside of EO designated sage grouse habitat. The project is located in Blaine and Phillips Counties. Land ownership within the project area consists of 85% private land, 11% Bureau of Land Management property, and 5% State of Montana Trust lands. Construction for the project will utilize direct plow as the primary installation method, with directional boring used at selected sites such as certain road crossings, streams, and crossings of other underground utilities.

Fiber optic cable will be installed using the direct plow method and directional bore method (at stream, gas-line, and high-grade road crossings). The direct plow method includes opening the ground with a plow blade pulled behind a track-type cable plow, laying the cable, immediately covering the cable, and smoothing the disturbed soil. The directional bore method includes vegetation removal, temporary soil storage, pit excavation, operation of construction equipment, and surface restoration. Pedestal and distribution vault installations include vegetation removal, temporary soil storage (typically less than an 8-hour workday), backfilling and compacting, and surface restoration. Construction and reseeding for both phases of the project will be completed by November 2019.

Based on the information you provided, your project is not within two miles of an active sage grouse lek. See Figure 1 (Project 3445 Turner FTTH Lek Location Map).

Segments Outside of Designated Executive Order 12-2015 Sage Grouse Habitat:

Project Description - Segments Outside of Designated Executive Order 12-2015 Sage Grouse Habitat:
All or a portion of the segments described below are outside of EO designated habitat for sage grouse. See Figure 2 (Turner FTTH Project 3445 Location Map).

Legal: Township 35 North, Range 25 East, Sections 22, 29
Township 35 North, Range 28 East, Sections 9, 10
Township 36 North, Range 27 East, Sections 27, 28
Township 36 North, Range 26 East, Sections 23,24
Township 36 North, Range 25 East, Sections 15, 22, 24
Township 35 North, Range 24 East, Section 1
Township 37 North, Range 23 East, Sections 21,27,28

Recommendations for Segments Outside of Designated Sage Grouse Habitat:
Based on the information you provided, the segments of your project identified above, are located outside of sage grouse habitat designated as a Core Area, General Habitat, or a Connectivity Area for purposes of conservation. Accordingly, they are not subject to Executive Orders 12-2015 and 21-2015, which set forth Montana's Sage Grouse Conservation Strategy.

Segments Within General Habitat for Sage Grouse:

Project Description - Segments Within General Habitat for Sage Grouse:
All or a portion of the segments described below are within General Habitat for sage grouse. See Figure 2 (Turner FTTH Project 3445 Location Map).

Legal: Township 33 North, Range 23 East, Sections 1, 2, 5, 6, 7,10,15,16,18,19, 20, 21, 29, 30
Township 34 North, Range 23 East, Sections 31, 36
Township 34 North, Range 24 East, Sections 1, 11, 12,13, 14, 21, 22, 24, 25, 28, 29, 30, 31
Township 34 North, Range 25 East, Sections 6, 10, 11, 2, 3, 30, 31
Township 35 North, Range 25 East, Sections 25, 26, 27, 28, 31, 32, 33, 34
Township 35 North, Range 28 East, Sections 10, 3, 4
Township 36 North, Range 24 East, Sections 1
Township 36 North, Range 25 East, Sections 1, 4, 10, 12, 13
Township 36 North, Range 26 East, Sections 6, 14, 17, 18, 23, 24
Township 36 North, Range 27 East, Sections 7, 13, 18, 19, 23, 24, 26
Township 36 North, Range 28 East, Sections 4, 5, 6, 7, 18, 19, 27, 28, 29, 30, 32, 33

Township 37 North, Range 23 East, Section 26
Township 37 North, Range 24 East, Sections 35
Township 37 North, Range 25 East, Sections 1, 12, 13, 2, 21, 24, 25, 26, 27, 28, 35, 36
Township 37 North, Range 26 East, Sections 6, 7, 8, 9, 10, 11, 12, 31, 32, 33, 34, 35
Township 37 North, Range 27 East, Sections 7, 8, 9, 10

Estimated Functional Acres Lost Over the Life of the Project and Total Debit Obligation:

The Program has calculated functional acres lost within the project area using the Habitat Quantification Tool (HQT) using HQT v1.0 October 2018 and Policy Guidance Document v1.0 October 2018. The results for this project are described as follows.

HQT Functional Acres Lost: 407.15
Reserve Account (20%): 81.43
Advance Payment (10%): 40.72
Site Specific Deviations from Executive Order 12-2015: 0
Total Debit Obligation: 529.30

Discussion:

The direct footprint and indirect impact area for the project will result in a total 529.30 debits. See Figure 3 (Turner FTTH Project HQT Basemap v1.0 Map and Operation Phase Map). Triangle Telephone Cooperative Association Inc. provided a mitigation plan outlining project specific avoidance, minimization, reclamation and compensatory mitigation to address project impacts. Triangle Telephone Cooperative Association Inc. chose to fulfill the mitigation obligation by making a contribution to the Stewardship Fund Account. Further after considering their options, Triangle Telephone Cooperative Association Inc. seeks to move forward at this time and is willing to forgo Montana Sage Grouse Oversight Team review and the potential MSGOT would develop a more refined approach to consultation and mitigation in the latter half of 2019.

Instructions for making a contribution to the Stewardship Fund Account are enclosed and require your signature. The Payment Cover Memo is intended to assist with the Program's recordkeeping. The Stewardship Account Donation Form includes instructions for wire transfer or check payments, found at the bottom of the form. Let us know what form of payment you would like to use when you return the signed forms. Payment should be made **after** you obtain your necessary permits but **before** initiating the project activity.

Mitigation:

The Mitigation Plan describes avoidance, minimization, reclamation, and compensatory mitigation measures Triangle Telephone Cooperative Association Inc. will implement to address and mitigate for unavoidable impacts from Executive Order 12-2015. Triangle Telephone Cooperative

Association Inc. has voluntarily committed to this Mitigation Plan (including compensatory mitigation).

The Mitigation Plan:

- describes the buried fiber cable project and summarizes activities that would occur within it;
- describes project mitigation in accordance with Executive Orders 12-2015 and 21-2015;
- summarizes potential impacts to sage grouse and sage grouse habitats;
- describes where the project adheres to the mitigation hierarchy through avoidance, minimization, reclamation; and
- explains Triangle Telephone Cooperative Association Inc. will make a contribution to the Stewardship Account to fulfill the mitigation debit obligation.

Final Recommendations for Segments Within General Habitat for Sage Grouse:

The following stipulations are taken from Montana Executive Order 12-2015. These stipulations are designed to maintain existing levels of suitable sage grouse habitat by managing uses and activities in sage grouse habitat to ensure the maintenance of sage grouse abundance and distribution in Montana. Development should be designed and managed to maintain populations and sage grouse habitats.

- Reclamation should re-establish native grasses, forbs, and shrubs during interim and final reclamation. The goal of reclamation is to achieve cover, species composition, and life form diversity commensurate with the surrounding plant community or desired ecological condition to the benefit of sage grouse and replace or enhance sage grouse habitat to the degree that environmental conditions allow.

- Weed management is required within a General Habitat for sage grouse. Reclamation of disturbed areas must include control of noxious weeds and invasive plant species, including cheatgrass (*Bromus tectorum*) and Japanese brome (*Bromus japonicas*).

- Implementation of the Mitigation Plan is binding, and it shall be attached to any permit the State issues. It is the Program's and MSGOT's expectation that the Mitigation Plan will be an integral part of any associated project permits.

Subject to the stipulations described above and voluntarily agreed to by Triangle Telephone Cooperative Association Inc. in the enclosed Mitigation Plan, your activities are consistent with the Montana Sage Grouse Conservation Strategy. Your proposed project or activity may need to obtain additional permits or authorization from other Montana state agencies or possibly federal agencies. They are very likely to request a copy of this consultation letter, so please retain it for your records.

Please be aware that if the location or boundaries of your proposed project or activity change in the future, or if new activities are proposed within one of the designated sage grouse habitat areas, please visit https://sagegrouse.mt.gov/projects/ and submit the new information.

Thanks for your interest in sage grouse and your commitment to taking the steps necessary to ensure Montana's Sage Grouse Conservation Strategy is successful.

Sincerely,

Carolyn Sime
Montana Sage Grouse Habitat Conservation Program Manager

Enclosures:

1. Stewardship Funds Account Donation Instructions
2. Turner FTTH Project 3445 Mitigation Plan
3. Figure 1. Project 3445_Turner FTTH Project Lek Location Map
4. Figure 2. Turner FTTH Project 3445 Location Map
5. Figure 3. 3445 Turner FTTH Project HQT Basemap v1.0 Map and Operation Phase Map

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